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April 27, 2020

By ECF

Honorable Vernon S. Broderick, U.S.D.J.
 United States District Court
 Southern District of New York
 40 Foley Square, Courtroom 518
 New York, New York 10007

Re: Recycling and General Industrial Union Local 108 Welfare Fund et al. v.
Donato Marangi, Inc. et al., No. 19-CV-04429 (VSB)

Dear Judge Broderick:

This firm represents plaintiffs in this matter and we submit this letter and the attached proposed revised Scheduling and Case Management Order jointly with all parties, pursuant to the Court's April 23, 2020 Order.

The proposed revised Case Management Order is identical to the Order entered by Your Honor on December 9, 2019 (Docket 27) other than the blank in Line 11 for the post-discovery conference and to reflect the extensions Your Honor has previously granted.¹

With respect to the post-discovery conference, the parties respectfully request that the current conference scheduled for May 15, 2020 be adjourned to a date convenient for the Court after the completion of discovery on June 26, 2020.

Thank you for your consideration.

Respectfully Submitted,

/s/ Zachary N. Leeds

cc: Counsel of Record (by ECF)

¹ Your Honor previously extended the deadline for all discovery and the completion of depositions (Docket No. 34) and the deadline to serve requests to admit (Docket No. 31).